

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MLD NO. 1456
LITIGATION)	Civil Action No. 01-12257-PBS
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)	Hon. Patti B. Saris
THIS DOCUMENT RELATES TO)	
01-CV-12257-PBS AND 01-CV-339)	Chief Mag. Judge Marianne B. Bowler
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**PLAINTIFF BLUE CROSS AND BLUE SHIELD OF MASSACHUSETTS, INC.’S
MOTION FOR LEAVE TO FILE DECLARATION OF STEPHEN L. COCO IN
SUPPORT OF OPPOSITION OF PLAINTIFF BLUE CROSS AND BLUE SHIELD OF
MASSACHUSETTS, INC.’S TO DEFENDANTS’ MOTION TO COMPEL UNDER SEAL**

Plaintiff Blue Cross and Blue Shield of Massachusetts, Inc. (“BCBSMA”) respectfully
moves this Court for leave to file the following document under seal:

Declaration of Stephen L. Coco in Support Of Opposition Plaintiff Blue Cross
and Blue Shield of Massachusetts, Inc. to Defendants’ Motion to Compel

Pursuant to the Protective Order entered by this Court on December 13, 2002 (The “MDL Protective Order”), the parties in the above-captioned cases have designated many documents and other information produced in these cases as either “CONFIDENTIAL” or ‘HIGHLY CONFIDENTIAL.’ In particular, the above-listed filing attaches or references documents and deposition testimony of BCBSMA which BCBSMA has been designated as “HIGHLY CONFIDENTIAL.” Pursuant to paragraph 15 of the MDL Protective Order, any document or pleading containing quotes from or otherwise referencing such information shall be filed under seal.

WHEREFORE, BCBSMA respectfully requests that this Court grant it leave to file the above-listed document under seal.

Respectfully Submitted,
BLUE CROSS AND BLUE SHIELD OF
MASSACHUSETTS, INC.
By its attorneys,

/s/ Stephen L. Coco
Christopher P. Sullivan (BBO# 485120)
James S. Harrington (BBO# 543774)
Stephen L. Coco (BBO# 561169)
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Dated: April 4, 2006

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1(a)(2), the undersigned certifies that I conferred with counsel for the defendants and was advised that the defendants consent to this motion.

/s/ Stephen L. Coco
Stephen L. Coco

CERTIFICATE OF SERVICE

I hereby certify that I, Stephen L. Coco, an attorney, caused a true and correct copy of the foregoing OPPOSITION OF PLAINTIFF BLUE CROSS AND BLUE SHIELD OF MASSACHUSETTS, INC. TO DEFENDANTS' MOTION TO COMPEL to be served on all counsel of record electronically, pursuant to Section D of Case Management Order No. 2, this 4th day of April, 2006.

/s/ Stephen L. Coco
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